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Attorneys for Defendant, Counter-Claimant
and Cross-Complainant First Advantage
Litigation Consulting, LLC

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TUDOR INSURANCE COMPANY,

Plaintiff,

vs.

FIRST ADVANTAGE LITIGATION
CONSULTING, LLC,

Defendant.

Case No. 11CV3567 (LAK)
(Electronically Filed)

**FIRST ADVANTAGE LITIGATION
CONSULTING, LLC'S ANSWER TO
FEDERAL INSURANCE COMPANY'S
CROSS-CLAIM FOR DECLARATORY
JUDGMENT**

FIRST ADVANTAGE LITIGATION
CONSULTING, LLC,

Counter-Claimant and Cross-
Complainant,

vs.

AMERICAN INTERNATIONAL SPECIALTY
LINES INSURANCE COMPANY, FEDERAL
INSURANCE COMPANY, TUDOR
INSURANCE COMPANY, ZURICH
AMERICAN INSURANCE COMPANY,

Counter-Claim Defendants

Defendant, First Advantage Litigation Consulting, LLC (“First Advantage”), hereby answers the “Cross-Claim For A Declaratory Judgment” of Counterclaim Defendant Federal Insurance Company (“Federal”) as follows:

ANSWER

99. Paragraph 99 is not directed to First Advantage.
100. Paragraph 100 is not directed to First Advantage.
101. Denied that Federal is not obligated to defend and indemnify First Advantage for the Underlying Action.

AFFIRMATIVE DEFENSES

First Advantage incorporates by reference its Affirmative Defenses set forth in its “Answer And Counter-Claim And Demand For Jury Trial For First Advantage Litigation Consulting, LLC.”

WHEREFORE, First Advantage prays for:

1. A declaration that Federal is obligated to defend and indemnify First Advantage for the Underlying Action;
2. That this court dismiss or abate this entire action to permit litigation in a more appropriate forum or, alternatively,
3. That this court transfer venue in this matter to the United States District Court for the District of New Jersey or, alternatively,
4. For judgment on the merits dismissing Tudor Insurance Company's complaint against First Advantage Litigation Consulting, LLC and entering judgment on First Advantage Litigation Consulting, LLC's counterclaim in favor of First Advantage Litigation Consulting, LLC and against each of AIG, Chubb, Tudor and Zurich as follows:

- a.** In the amount of compensatory damages, both special and general, proved at trial;
 - b.** For prejudgment interest in the maximum amount allowed by law from the date such damages became due;
 - c.** For declaratory relief stating the respective rights and obligations of the parties with respect to the Underlying Litigation; and
 - d.** For all attorney's fees, expert fees, and costs of this action; and
- 5. For such further relief as the Court in its discretion deems just and appropriate.

Dated: September 6, 2011

ANDERSON KILL & OLICK

By: /s/ Edward J. Stein

Edward J. Stein
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